

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Orange County Metal Processing - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IX

Subject: POLREP #5
Progress POLREP
Orange County Metal Processing
A955
Fullerton, CA

To: Harry Allen, EPA Region 9
Daniel Meer, EPA Region 9

From: Craig Benson, On-Scene Coordinator

Date: 7/24/2014

Reporting Period: 7/14/14 - 7/18/14

1. Introduction

1.1 Background

Site Number:	A955	Contract Number:	
D.O. Number:		Action Memo Date:	4/29/2014
Response Authority:	CERCLA	Response Type:	PRP Oversight
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	6/3/2014	Start Date:	6/3/2014
Demob Date:		Completion Date:	
CERCLIS ID:	A955	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time-Critical PRP Removal Action

1.1.2 Site Description

Orange County Metal Processing (OCMP) is an abandoned metal zinc plating and anodizing business that processed parts for the automobile and computer industries. The company conducted business from approximately 1980 until 2011 at one parcel in a light industrial area of Fullerton, Orange County, California. Previous metal plating operations are believed to have been conducted at the site beginning in the 1960s.

The primary constituents of concern at OCMP include sludge's and solutions bearing cyanide, chromium, copper and zinc, and acidic and caustic compounds. The Orange County Health Care Agency (OCHCA) requested EPA's assistance with the Site on March 12, 2014.

1.1.2.1 Location

OCMP is located in a mixed commercial and industrial area at 1711 E. Kimberly Avenue, Fullerton, California in the east portion of the city of Fullerton (Latitude: 33.8638° Longitude: -117.8961°). The Site is located on the western portion (approximately 0.3 acres) of Assessor's Parcel Number (APN) 033-270-30. The larger central and eastern portion of the parcel housed the former PCA Metal Finishing, Inc. business with an address of 1726 East Rosslyn Avenue.

A stormwater channel, railroad track, Kimberly Avenue, and commercial and industrial businesses are located to the south of the Site. Rosslyn Avenue and commercial/industrial businesses are located north of the Site. The Santa Ana River, the primary surface water drainage feature in the area, is located approximately 2.5 miles east and southeast of the site.

1.1.2.2 Description of Threat

See POLREP #1

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

See POLREP #1

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

See POLREPS 1 thru 4 for activities occurring 6/3/14 thru 7/11/14.

Week of 7/14/14 – 7/18/14

On 7/14/14, OSC Benson held an on-site meeting with the PRP, PRP representatives (council and contractors), the DTSC Cleanup Program Project Manager and DTSC contractors, and the Orange County Health Care Agency (OCHCA) representative. The purpose of the meeting was to discuss the post-removal disposition of the site once the above-ground hazardous waste management terms of the EPA UAO are fully met.

The draft PRP contractor Workplan Addendum (Dudek 2014) was briefly discussed and the group toured the removal areas in the North and South rooms to inspect the pits where the plating lines once stood. The Workplan Addendum was specifically prepared to address sampling and analysis of the concrete floors and shallow soil environment underneath the exposed plating pits. Participants were asked to weigh in on elements of the Workplan Addendum, including analytes, scope of sampling and the temporary disposition of the removal areas, especially the floors and walls of the pit areas. Counsel for the property owner indicated that the removal action was a first step in a larger effort to prepare the site for a "responsible transfer" of the property, which will likely include a more inclusive cleanup effort.

The Workplan Addendum called for coring the concrete, collecting soil samples from the first six inches of soil encountered, and analyzing both the concrete and soil for metals, hexavalent chromium, cyanide, and pH. None of the participants expressed any concern about the analyte list for the assessment. The DTSC indicated that they would like to see some kind of temporary liner in the pits to ensure that rainwater does not accumulate and leach contaminants into the groundwater in the period after the removal action and full subsurface remediation efforts. Both the DTSC and OCHCA expressed an interest in expanding the depths of soil sampling beyond the first six inches to provide some indication of extent and attenuation of gross contamination in the shallow subsurface. The following action items came out of this meeting:

- o Dudek will revise the Workplan Addendum to include soil sampling two feet below the concrete surface; the samples may be held at the laboratory pending the analyses of the six-inch samples, provided that the data decision process does not conflict with the holding times for the soil samples (especially hexavalent chromium, pH, and cyanide).
- o The disposition of the pit concrete/cinder block in the pit walls and floors will largely depend on the laboratory results of the assessment.
- o Dudek will include more recent(2012) DTSC sponsored shallow subsurface soil analytical results in the prior soil sampling data section of the Addendum for completeness.
- o Dudek will investigate the feasibility of installing a temporary, impermeable liner in the pits to cover stained and/or encrusted concrete, as well as minimize contact and percolation of meteoric water.

On 7/17/14, OSC Benson reviewed and approved the revised Workplan Addendum submitted by Dudek.

On 7/18/14, Dudek implemented the Workplan Addendum by collecting all the concrete core and shallow soil samples, patching all holes with cement and submitting the samples to an approved laboratory for the specified analysis.

Seven manifested loads of hazardous waste were also transported off-site (see 2.1.4 Progress Metrics). The major wastestreams remaining on-site include the debris piles from the pit cleanout effort (awaiting final profiles).

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Three PRPs received CERCLA General Notice Letters and a CERCLA UAO. The property ownership trust has been a responsive PRP and is currently complying with the terms of the UAO. All phases of the removal will be approved and overseen by EPA.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Facility</i>	<i>Date</i>
Hazardous Waste Liquid, N.O.S. (D007, D005)	Liquids	4,600 gals.	013102317JJK	Evoqua	6/16/14
Hazardous Waste Liquid, N.O.S. (D007, D005)	Liquids	1,250 gals.	013102316JJK	Evoqua	6/17/14
Waste Cyanide Solutions, N.O.S. (D007, F007)	Liquids	1,500 gals.	013102450JJK	US Ecology	6/25/14
Waste Corrosive Liquid, Acidic, Inorganic, N.O.S. (D002, D007, D005)	Liquids	1,925 gals.	013102446JJK	US Ecology	6/25/14
Hazardous Waste Solid, N.O.S. (D003, D005, D007, F008)	Solids	32,500 lbs.	013265318JJK	US Ecology	6/30/14
Waste Oxidizing Liquid,					

Corrosive, N.O.S. (D001, D002, D007, D010, D011)	Liquids	275 gals.	013265310JJK	Evoqua	6/30/14
Hazardous Waste Solid, N.O.S. (D007, D005)	Solids	70 cubic yards	013265324JJK	US Ecology	6/30/14
Hazardous Waste Solid, N.O.S. (D003, D005, D007, F008)	Solids	1,000 lbs.	013265352JJK	US Ecology	7/1/14
Hazardous Waste Solid, N.O.S. (D007, D005)	Solids	70 cubic yards	013265321JJK	US Ecology	7/1/14
Hazardous Waste Liquid N.O.S. (D007, D005)	Liquids	250 gals.	013265071JJK	Evoqua	7/18/14
Various Lab Packs - flamm. corr., oxidizing, toxic	Liquids	530 lbs.	013265072JJK	Crosby & Overton	7/18/14
Various bulked drums - aerosols, hypochlorite, etc.	Liquids	200 gals.	013265074JJK	Crosby & Overton	7/18/14
Hazardous Waste Solid, N.O.S. (D007, D005)	Solids	25 cubic yards	013265266JJK	US Ecology	7/18/14
Waste Corrosive Solid, Basic, Inorganic, N.O.S. (D007)	Solids	25 cubic yards	013265264JJK	US Ecology	7/18/14
Waste Corrosive Liquids and Solids, N.O.S. and Non-RCRA Hazardous Waste Liquids	Solids Liquids	4,500 lbs. 805 gals.	013265251JJK	US Ecology	7/18/14
Waste Oxidizing Solid, Corrosive, N.O.S. (D001, D007)	Liquids	55 gals.	013265262JJK	US Ecology	7/18/14

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

2.2.1.2 Next Steps

Await laboratory analytical results for the pit concrete and soil samples.

Profiling and transportation and disposal of the remaining on-site wastestreams.

2.2.2 Issues

Numerous limited subsurface environmental investigations have been conducted at OCMP and adjoining former PCA property since 1990. In 2007, DTSC conducted a Phase I Environmental Assessment Verification of the OCMP property. Results of this Phase 1 Verification suggested that volatile organic compounds (VOCs) tetrachloroethylene (PCE) and trichloroethylene (TCE) were potential constituents of concern in soil gas and in groundwater at/around the property. DTSC began using State Orphan Funds (Hazardous Substances Cleanup Account) to further investigate and eventually begin subsurface remediation at the Site.

A soil, soil vapor, and groundwater investigation was conducted by DTSC's Brownfield and Environmental Restoration Program (Cleanup Program) in 2012 to identify the areas where VOCs were present in the subsurface and to get a general understanding of groundwater contamination levels. Soil gas and groundwater sample results confirmed that PCE and TCE are the primary VOCs present however, a source area for the VOCs was not identified and the lateral and vertical extent of VOCs was not delineated based on the data obtained. Concentrations of metals in groundwater and soil samples were within the background ranges and did not indicate metal impacts to soil or groundwater from site operations.

DTSC's effort ultimately resulted in the installation of a Soil Vapor Extraction (SVE) system that encompasses both the former PCA facility and OCMP property. The SVE system has been operated intermittently by DTSC since May 2012. In the meantime, DTSC has conducted additional investigation at the PCA facility and has also brought on additional extraction wells to feed into the SVE system. The aboveground components of the SVE system involve a trailer mounted high vacuum blower staged near the south anodizing line and piping runs from extraction wells to a knockout tank and dual 2000 pound vapor phase granular activated carbon vessels connected in series in proximity to the wastewater treatment system.

According to the DTSC Cleanup Program Project Managers, from this point forward, PCA and OCMP will be considered as one large site for subsurface cleanup purposes due to the location of the plume. Currently, there is a groundwater pilot test being evaluated by DTSC to assess the feasibility of implementing a groundwater remedy at the site. There are already plans to expand the SVE system to accommodate areas where the radius of influence for extraction is not reachable.

The DTSC sponsored subsurface investigation and remediation effort is an area wide effort and is not necessarily related to past or on-going practices at the OCMP. It is summarized here as the above ground features of the SVE system and the numerous groundwater monitoring, soil vapor and soil boring

installations are key characteristics of the site today. In addition, the DTSC ISE and use of State Orphan Funds is intended only for subsurface remediation issues.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

No information available at this time.

4. Personnel On Site

No information available at this time.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.